

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

MOTION TO INFORM TRANSFER OF CLAIM

COMES NOW Cedar Glade LP (“Cedar Glade” or “Movant”), by and through the undersigned legal counsel, and respectfully informs the Court as follows:

1. On May 3, 2017, the Commonwealth of Puerto Rico (“Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), filed a petition under title III of PROMESA with the United States District Court for the District of Puerto Rico (the “Title III Case”).

2. On March 14, 2018, Ecolift Corporation (“Ecolift”) filed Proof of Claim No. 1969

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

in the amount of \$728,526 (the “Proof of Claim”) in the Title III Case.

3. On November 17, 2022, Ecolift sold, transferred, and assigned all of its rights, title, and interest in the Proof of Claim to Cedar Glade, as set forth in **Exhibit A** hereto.

WHEREFORE, pursuant to Rule 3001(e) of the Federal Rules of Bankruptcy Procedure, Movant requests that the title and ownership of Proof of Claim No. 1969 be transferred from Ecolift to Cedar Glade, and that the claims register correctly identify Cedar Glade as the title holder and current owner of the Proof of Claim.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of December 2022.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s *Sixteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 20190-1) (the “CMP Order”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

Attorneys for Cedar Glade LP
MCCONNELL VALDÉS LLC
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By: /s/Nayuan Zouairabani
Nayuan Zouairabani
USDC No. 226411
Email: nzt@mcvpr.com

Exhibit A

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, as
representative of THE COMMONWEALTH OF
PUERTO RICO, et al.,

Debtor.

PROMESA

Title III

Case No. 17-03283 (LTS)

(Jointly Administered)

TRANSFER OF CLAIM OTHER THAN FOR SECURITY

A CLAIM HAS BEEN FILED IN THIS CASE or deemed filed under 11 U.S.C. § 1111(a). Transferee hereby gives evidence and notice pursuant to Rule 3001(e)(2) of the Federal Rules of Bankruptcy Procedure of the transfer, other than for security, of the claim referenced in this evidence and notice.

Cedar Glade LP

Name of Transferee

Last Four Digits of Acct #: N/A

Address where notices
and payments to Transferee should
be sent:

600 Madison Avenue, 17th Floor
New York, NY 10022

ECOLIFT CORPORATION

Name of Transferor

Last Four Digits of Acct #: N/A

Claim No: 1969

Case No.: 17-3282

Date Filed: 03/14/18

Total Amount of Claim: \$728,526.00

Transferred Amount of Claim: \$728,526.00

I declare under penalty of perjury that the information provided in this notice is true and correct to the best of my knowledge and belief.

By: Robert Minkoff
Transferee/Transferee's Agent

11/29/2022 | 12:02 PM EST
Date: _____, 2022

Penalty for making a false statement: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 & 3571.